

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Sean Pak (Bar No. 219032)
seanpak@quinnemanuel.com
3 Melissa Baily (Bar No. 237649)
melissabaily@quinnemanuel.com
4 James Judah (Bar No. 257112)
jamesjudah@quinnemanuel.com
5 Lindsay Cooper (Bar No. 287125)
lindsaycooper@quinnemanuel.com
6 Iman Lordgooei (Bar No. 251320)
imanlordgooei@quinnemanuel.com
7 50 California Street, 22nd Floor
San Francisco, California 94111-4788
Telephone: (415) 875-6600
8 Facsimile: (415) 875-6700

9 Marc Kaplan (*pro hac vice*)
marckaplan@quinnemanuel.com
10 191 N. Wacker Drive, Ste 2700
Chicago, Illinois 60606
11 Telephone: (312) 705-7400
Facsimile: (312) 705-7401

12 *Attorneys for GOOGLE LLC*

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 SONOS, INC.,
18 Plaintiff,
19 vs.
20 GOOGLE LLC,
21 Defendant.

CASE NO. 3:20-cv-06754-WHA
Consolidated with CASE NO. 3:21-cv-07559-
WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF GOOGLE LLC'S
UNOPPOSED ADMINISTRATIVE
MOTION TO EXTEND DEADLINES
MOTION FOR ATTORNEYS' FEES AND
BILL OF COSTS**

22

23

24

25

26

27

28

1 I, Lindsay Cooper, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Motion to Extend Deadlines for
 7 Motion for Attorneys’ Fees and Bill of Costs.

8 3. Since receiving the Court’s final judgment, Google and Google’s counsel have
 9 worked diligently to ensure that its requests for fees and costs are as narrowly tailored as possible.

10 4. However, Google requests additional time to ensure that its requests are as narrowly
 11 tailored as possible and afford the parties sufficient time to meet and confer and minimize any
 12 disputes raised to the Court.

13 5. I understand that without an extension, Google will be substantially harmed if it is
 14 unable to thoroughly analyze each request for fees and costs. Since this Court has held that
 15 “overreach for fees warrants denial,” Google could be prejudiced if it submits an over-inclusive
 16 request to the Court. *In re Glob. Equity Mgmt. (SA) Pty. Ltd.*, No. C 17-02177 WHA, 2020 WL
 17 4732210, at *1 (N.D. Cal. Aug. 15, 2020).

18 6. On October 19, 2023, Google met and conferred with Sonos, Inc. (“Sonos”) about
 19 its proposed motion. Sonos confirmed it does not oppose the requested relief.

20 7. The proposed extensions will not affect the parties’ ability to comply with the other
 21 deadlines set forth in this case.

22 8. With respect to Civil L.R. 6-3(a)(5), I am aware of the following previous
 23 modifications to the case schedule based on my review of the docket:

- 24 a. On March 12, 2022, the Parties stipulated to an extension of Google’s deadline to
 answer or move to dismiss Sonos’s counterclaims to seven days after the Court’s
 order on Google’s motion to dismiss in the related case. Dkt. 156.
- 26 b. On May 18, 2022, the Court vacated the initial patent showdown trial date and set
 the trial for October 3, 2022. Dkt. 269.
- 27 c. On May 4, 2022, the Court granted the Parties’ stipulated request to extend the
 mediation deadline to accommodate their preferred mediator’s schedule. Dkt. 245.

- d. On July 15, 2022, the Court granted the Parties' stipulated request to extend expert pretrial deadlines for the patent showdown trial. Dkt. 304.
- e. On August 22, 2022, the Court granted the parties' stipulated request to extend the expert discovery deadline for the patent showdown trial. Dkt. 328.
- f. On November 14, 2022, the Court granted the Parties' stipulated request to extend expert report and discovery deadlines. Dkt. 402.
- g. On December 7, 2022, the Court granted the Parties' stipulated request to extend the deadline for Google's Opposition to Sonos's Motion for Leave to Amend Infringement Contentions Pursuant to Patent L.R. 3-6. Dkt. 417.
- h. On December 22, 2022, the Court granted the Parties' stipulated request to extend the deadline for Expert Discovery, Expert Reports, and Dispositive Motions. Dkt. 434.
- i. On January 4, 2023, the Court advanced the trial date from May 10, 2023 to May 8, 2023. Dkt. 444.
- j. On January 27, 2023, the Court granted the Parties' stipulated request to extend the close of fact discovery to accommodate the Parties' expert witnesses' schedules. Dkt. 460.
- k. On March 9, 2023, the Court granted the Parties' stipulated request for an order setting a schedule for pretrial deadlines. Dkt. 547.
- l. On June 7, 2023, the Court granted the Parties' joint stipulation extending time for filing bill of costs. Dkt. 811.
- m. On July 30, 2023, the Court granted Google's administrative motion to extend the deadlines for its new omnibus motion to seal and the parties' refilings of all material they no longer seek to seal.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on October 20, 2023, in Mill Valley, California.

By: /s/ Lindsay Cooper
Lindsay Cooper

ECF ATTESTATION

I, Sean Pak, am the ECF User whose ID and password are being used to file this Declaration.
In compliance with Civil Local Rule 5-1, I hereby attest that Lindsay Cooper has concurred in this
filing.

5 | Dated: October 20, 2023

By: /s/ Sean Pak
Sean Pak